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May 20, 2016

**VIA CM/ECF**

The Hon. Kevin McNulty  
United States District Judge, District of New Jersey  
Martin Luther King Jr. Federal Building &  
U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *Albert Snellink v. Universal Travel Group, Inc., et al.*, No. 11-CV-2164 (KM) (JBC)

Dear Judge McNulty:

My firm represents Lead Plaintiffs in the above-referenced action, and we also write on behalf of all (with Plaintiffs, the “Parties”), to update the Court on the progress of negotiating settlement documents. As we disclosed in our April 1 letter, the Parties have reached comprehensive Settlements that, if approved by the Court, would dispose of this entire Action.

The Parties are making progress in negotiating and drafting settlement papers and working cooperatively to resolve any remaining issues. However, due to unforeseen contingencies, the Parties will not be able to complete settlement documents in time for Plaintiffs to file for preliminary approval on May 20, 2016, as they previously anticipated. The Parties expect they will be able to complete settlement documents on or before July 1, 2016.

Respectfully submitted,

/s/ Laurence M. Rosen  
Laurence M. Rosen, Esq.

cc: All counsel of record via CM/ECF  
The Hon. James B. Clark, U.S.M.J. (by first class mail)